rec'l 119/06



## United States Department of the Interior

FISH AND WILDLIFE SERVICE Ventura Fish and Wildlife Office 2493 Portola Road, Suite B Ventura, California 93003 U.S.
FISH & WILDLIFE
SERVICE

IN REPLY REFER TO: PAS 1603.3685.4439

December 20, 2005

Joan Lang, Commandant U.S. Coast Guard Deepwater Ports Standards Division, Room 1210 2100 Second Street, SW Washington, D.C. 20593

Subject:

Species List for Cabrillo Deepwater Port Project, Ventura County, California

Dear Ms. Lang:

We are responding to your request, dated September 15, 2005, for information on proposed, threatened, or endangered species that may be present in the vicinity of the proposed pipeline routes. In addition, you requested that we informally consult with you regarding the presence of federally listed species that may be affected by the proposed project. The project includes construction of a natural gas pipeline segment in Ventura County that would connect to an offshore floating, storage, and regasification unit. The proposed pipeline routes are located on Ormond Beach in the City of Oxnard and on Ormond Beach East within Point Mugu Naval Base in Ventura County. We understand that the U.S. Coast Guard (Guard) is the lead Federal agency for the project, and that it would assume responsibility under section 7 of the Endangered Species Act of 1973, as amended (Act). Your request and our response are made pursuant to Section 7 of the Act.

The enclosed list of species fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Act. The Guard, as the lead Federal agency for the project, has the responsibility to review its proposed activities and determine whether any listed species may be affected. Because the project is a construction project which requires an environmental impact statement, the Guard has the responsibility to prepare a biological assessment to make a determination of the effects of the action on listed species or critical habitat. If the Guard determines that a listed species or critical habitat is likely to be adversely affected, it should request, in writing through our office, formal consultation pursuant to section 7 of the Act. Informal consultation may be used to exchange information and resolve conflicts with respect to

<sup>&</sup>lt;sup>1</sup> "Construction project" means any major Federal action which significantly affects the quality of the human environment designed primarily to result in the building of structures such as dams, buildings, roads, pipelines, and channels. This includes Federal actions such as permits, grants, licenses, or other forms of Federal authorizations or approval which may result in construction.

threatened or endangered species or their critical habitat prior to a written request for formal consultation. During this review process, the Guard may engage in planning efforts but may not make any irreversible commitment of resources. Such a commitment could constitute a violation of section 7(d) of the Act.

During a telephone conversation on October 27, 2005, involving Rick Farris and Eric Morrissette of our staff, the Guard, the Environmental Protection Agency, and National Oceanic and Atmospheric Administration (NOAA) Fisheries, the Guard indicated that the appropriate determinations had been made in the Draft Environmental Impact Statement/Environmental Impact Report (EIS/EIR) for the project. The determinations in the EIS/EIR are stated in terms of "significance," not "adverse effects." Thresholds of significance required by the National Environmental Policy Act and the California Environmental Quality Act are not equivalent to the "may affect" or "adverse effect" determinations required by section 7 of the Act. We recommend that you follow the examples that were to be provided to you by NOAA Fisheries (as discussed during the October 27, 2005, conference call) for submitting your determinations and requesting concurrence or initiation of formal consultation.

As stated earlier, because listed species are known to occur in the project area, the next step in the consultation process is for the Guard to prepare a biological assessment and to make a determination as to whether the proposed project may affect any of the species on the enclosed list. The biological assessment may be excerpted from the draft EIS/EIR; however, the effect determinations must be based in the section 7 regulations. Based upon the determinations made by the Guard, we will respond to your request for our concurrence on determinations of "may affect, but not likely to adversely affect," or initiate formal consultation for those species or critical habitat the project is likely to adversely affect.

If you have any questions, please contact Doug Threloff of my staff at (805) 644-1766, extension 327.

Sincerely,

Carl I. Benz

Assistant Field Supervisor

Southern Santa Barbara/Ventura/Los Angeles

Enclosure

cc: David Schmidt, EPA Region 9
Monica DeAngelis, NOAA Fisheries

# FEDERALLY LISTED SPECIES THAT MAY OCCUR IN THE VICINITY OF PROPOSED PIPELINE ROUTES FOR THE CABRILLO DEEPWATER PORT PROJECT, VENTURA COUNTY, CALIFORNIA

Salt marsh bird's-beak	Cordylanthus maritimus ssp. maritimus	Е
Brown pelican	Pelecanus occidentalis	Е
Tidewater goby	Eucyclogobius newberryi	E
California least tern	Sterna antillarum browni	E
Western snowy plover	Charadrius alexandrinus nivosus	T, CH

### Key:

E - Endangered T - Threatened CH - Critical habitat

Commandant United States Coast Guard 2100 Second Street, S.W. Washington, DC 20593-0001 Staff Symbol: G-PSO-5 Phone: (202) 267- 0225 Fax: (202) 267- 4570 Email: mprescott@comdt.uscq.mil

16113 April 5, 2006

Mr. Rolland A. Schmitten
Director, Office of Habitat Conservation
U.S. Department of Commerce
National Oceanic and Atmospheric Administration
National Marine Fisheries Service
1315 East-West Highway
Building 3, 14<sup>th</sup> Floor F/HC2
Silver Spring, MD 20910

Dear Mr. Schmitten:

This letter is in reply to your comments and recommendations, dated December 20, 2004, on the draft Environmental Impact Statement/Environmental Impact Report for the Cabrillo Port Liquified Natural Gas (LNG) Deepwater Port issued in October 2004. The statutory timeline for this project has been suspended since January 5, 2005 in order to obtain additional information from the applicant. We anticipate issuing a final EIS later this year addressing your agency's comments. The attached document contains a condensed version of the responses we intend to incorporate in the final EIS, most or all of which can be found in the Draft EIS/EIR as well.

If you have any further questions, please contact me at (202)-267-0225 or Mr. Ray Martin at (202) 267-1683.

Sincerely,

M.A. PRESCOTT

Chief, Deepwater Ports Operating Standards Division

U.S. Coast Guard

By Direction

Attachment: EFH Conservation Recommendations

Copy: Thomas E. Bigford

#### **EFH Conservation Recommendations**

All recommendations will be incorporated into the FEIR/FEIS.

1. Applicant to prepare an HDD (horizontal directional drilling) contingency plan and the plan should be implemented prior to any construction.

The applicant has proposed to use HDB (horizontal directional boring) to install pipelines beneath the shore. HDB uses a semi-closed-loop in which excess mud and cuttings are pumped back to the drilling rig; lower pressures are used and the possibility of drilling fluid release is minimized or eliminated. HDD will continue to be used for all waterways within Los Angeles County. The applicant will be required to prepare a HDD/HDB Drilling Contingency Plans in accordance with federal/state/local requirements prior to any construction activity. The plan will address remedial actions, as approved by the regulatory agencies. In the event of a release, measures in the plan require drilling operations to cease and the California Department of Fish and Game, and the US Fish and Wildlife Service to be notified. Furthermore, biological monitors would be on site to ensure compliance with the plan.

2. Applicant to develop a spill, prevention plan to ensure that oil, fuel, and LNG spills during construction or operation are not accidentally released into the marine environment. The plan should also address a training program that will enable workers to recognize and respond to spills.

Please note that a Spill, Prevention, Control, and Countermeasures Plan (SPCC) is an EPA requirement that will be mandatory for shore side and on shore construction. The SPCC will be approved prior to any construction activity. The Coast Guard and EPA share responsibility for Federal On scene Commander (FOSC) oversight for spills and clean-up. The delineation of responsibilities for onshore and offshore regions for each agency are outlined in EPA regulations, formally known as the National Response Plan (40 CFR Part 300 and associated regulatory cites).

The LNG Carriers are subject to compliance under the International Safety Management (ISM) Code, (Annex IX of SOLAS). This has been incorporated into U.S. regulations in 33 CFR Part 96. An integral part of the Safety Management System (SMS) will be an approved comprehensive vessel response plan, outlining response measures to specific contingencies such as spills, collisions, grounding, fire, personal injuries, etc.). All crewmembers must be thoroughly familiar with response procedures through training and drills. The Shipboard Oil Pollution Emergency Plan (SOPEP) would be an annex or subset of this set of documents. An SMS Certificate will be issued which the Coast Guard would review and verified annually. In addition, in accordance with Coast Guard Deepwater Port regulations each deepwater must have a facility response plan that would cover the FSRU.

3. The applicant to treat groundwater and sewage in approved sanitary waste systems pursuant to National Pollution Discharge Elimination System (NPDES) requirements. The applicant is also to appropriately treat deck water.

The applicant is required to obtain an NPDES permit for all point source discharges. The permit will regulate the discharge of grey water, treated sewage, deck water and groundwater, if discovered during excavation and drilling. Run-off from the deck would be treated in an oil and water separator before discharge.

The State of California has adopted a general water permit covering non-point discharges from certain industrial facilities and construction sites covering more than 1 acre. The State's Construction General Permit requires preparation of a storm water pollution prevention plan and implementation of best management practices to reduce the potential for pollutants (chemicals and sediments) to be discharged from the construction site to waters of the State.

4. Applicant will conduct all ballast water discharges from the FSRU and LNGCs in compliance with [state and federal regulations].

The LNGCs would follow International Maritime Organization (IMO) regulations regarding ballast water. Ballast water exchanges would occur outside the 200-NM (230 miles or 371 km) Exclusive Economic Zone and be recorded and reported. Ballast water for the FSRU would be obtained from and discharged to the ocean in same general area (42.7 feet [13m]) below the hull of the FSRU. No chemicals will be added. Since the LNGCs are discharging cargo, they would not be discharging ballast water and ballast water intakes would be screened and flow rates maintained of less than 0.5 feet per second (0.15 meters per second).

#### Fish and Wildlife Coordination Act Recommendations

All recommendations will be incorporated into the FEIS/FEIR.

1. The applicant will develop a Grunion Protection Plan (GPP) that identifies construction measures to ensure that impacts on grunion spawning events are avoided and minimized.

The Applicant has committed to construction in December and January, outside of the spawning period. Also, the use of HDB drilling for pipeline shore crossings minimizes potential impacts (compared to HDD). However, if intertidal beach work occurs between February and September, the Applicant will be required to have a qualified biologist to monitor the beach within 100 ft (30.5 m) of the route during the two weeks prior to installation. If a grunion spawning event occurs during the two weeks prior to construction activities, installation will be delayed until the grunion eggs hatch (approximately 2 weeks). A qualified biologist shall determine on which day construction can begin again after the spawning event. While the EIS/EIR does not identify this mitigation as a GPP, *per se*, it does contain the elements of a GPP. During

research on this issue, it appears that the Army Corps of Engineers has included these requirements, and identified them as a GPP, in applicable Section 404 permits.

2. The applicant is to avoid hard bottom habitats during pipe laying construction.

According to the Fugro 2004 report, the proposed pipeline route consists of dense sand and silty sand in the nearshore area, sandy silts, and silts near the shelf edge, and fine grain to clays on the upper ridge slopes. The FSRU anchorage area would be located above the Hueneme Fan in areas that are hummocky to flat and contain a thin clay layer overlying hard or dense turbidite deposits. The report concluded that there are no hard bottom habitats, no known kelp beds or hard substrata habitat within or near the proposed project. However, the applicant will be required to avoid any hard bottom habitat encountered during construction.

#### **Endangered Species Act and Marine Mammal Protection Act Recommendations**

Please note that the Draft EIS served as the informal consultation document under the ESA. All recommendations will be incorporated into the FEIS/FEIR.

1. The guidelines regarding marine mammals, particularly transiting whales, dolphins and pinnipeds should be made available to all vessel operators and posted in the pilothouse.

The applicant will conduct off-shore construction activities outside the grey whale migration season (June 1 through November 30). In addition, all construction vessels would carry 2 qualified marine monitors and operational vessels will carry 1 qualified marine monitor.

In brief, the following actions would be implemented (and posted in the pilothouse). More complete descriptions will appear in the FEIS.

- a) Monitors would receive training from a qualified independent marine wildlife mitigation firm approved in advance by NOAA Fisheries/USFWS in consultation with CDFG.
- b) All monitors would be familiar with the mitigation measures in the Marine Mammal Monitoring Protocol and in the Final EIS/EIR; copies would be in their possession during monitoring.
- c) Monitors would have the authority to stop work until monitors determine there is no longer a threat and/or the animal transits the area and that project operations do not have the potential to threatened the health and safety of marine wildlife or "take" a protected species.
- d) While on watch, monitors would be on duty 24 hours a day, unless the vessel is in harbor or anchorage. While on watch, monitors will not have any other duties assigned to them. MMS Notice to Lessees 2004-G01 will be followed.
- e) Monitoring would be conducted during all construction activities and as each vessel travels to and from the construction site. Supply, support and

- crew vessels transiting to and from the site during operations will also be monitored.
- f) Monitors will employ avoidance measures of 1,000 ft (305 m) for whales and threatened and endangered species. Other protocols for minimizing impacts include:
  - i. Approach whales from side or rear on a parallel course
  - ii. Do not cross directly in front of whales
  - iii. Maintain the same speed as whales
  - iv. Do not attempt to drive or herd whales
  - v. If a whale exhibits evasive or defensive behavior, the vessel will be stopped until the whale has left the immediate area
  - vi. Do not come between a mother and its calf.
- g) In addition, similar requirements will apply to the pipelaying vessel.
- h) In the unlikely event that a whale is injured, the vessel operator would notify appropriate personnel including, but not limited to:

NOAA Fisheries CDFG CSLC

2. What will be the frequency of helicopters accessing the FSRU and the flight path? These activities have the potential to harass seals and sea lions, particularly if the helicopters travel over any known haul out sites for these species.

Although the FSRU will be equipped with a helicopter landing pad, helicopters would not be used as part of the regular operations. They might be used in the rare case of an emergency (medical illness) or occasional visitor.

The FSRU would be 1 NM (1.2 m or 1.9 km) from the nearest haul out site and would travel in a straight line from point of origin and the FSRU. Therefore, with rare use and flight path, helicopters are not likely to affect these species. In addition, the Applicant will be required to ensure that helicopters will maintain a flight altitude of at least 2,500 feet (762 m) except for take-off and landings.

- 3. Sentences should read: "During construction, USFWS *and NMFS* approved marine mammal and *sea turtle* monitors..."
  - a) In the appropriate sections, the following sentence appears: "Monitors would receive training from a qualified independent marine wildlife mitigation firm approved in advance by NOAA Fisheries/USFWS in consultation with CDFG.

Commandant United States Coast Guard 2100 Second Street, S.W. Washington, DC 20593-0001 Staff Symbol: G-PSO 5 Phone: (202) 372-1440 Fax: (202) 372-1926 Email: mprescott@comdt.uscg.mil

16113 June 5, 2006

Ms. Monica DeAngelis Protected Resources, Southwest Region National Marine Fisheries Service 501 Ocean Blvd Long Beach, CA 90802-4213

Dear Ms. DeAngelis:

In accordance with Section 7(a)(2) of the Endangered Species Act, as amended, the U.S. Coast Guard (USCG) seeks to finalize informal consultation with the National Marine Fisheries Service (NMFS) Southwest Regional office regarding the construction of the pipeline and operation of the proposed Cabrillo Port Deepwater Port. The proposed port would be located approximately 14 miles off Ventura County, at the inshore side of the Southern California Bight (see enclosure 1). BHP Billiton (the applicant) has proposed a floating, storage, and regasification unit (FSRU) for transforming liquefied natural gas (LNG) back to its gaseous state. The regasification process would be a controlled heating process consisting of a closed system with combustion vaporizers; seawater would not be used to regasify the LNG. The proposed route for the two parallel off-shore pipelines would connect the FSRU to the shore at Ormond Beach, Ventura County (see enclosure 2). The USCG has reached specific conclusions regarding impacts that might result from the construction and operation of the proposed project on each protected resource under NMFS' jurisdiction. The USCG seeks your concurrence for same.

The USCG and the California State Lands Commission have jointly developed a Draft Environmental Impact Statement/Draft Environmental Impact Report (DEIS/DEIR) on this proposed project. The proposed project has three distinct phases: construction of the two parallel offshore pipelines, construction of the onshore pipeline, and the mooring and operation of the FSRU. The offshore pipelines will take approximately 35 days for construction. The mooring of the FSRU will take approximately 20 days. The FSRU is expected to operate for 40 years. For the purposes of this consultation, we will focus on the construction of the offshore pipelines and FSRU operations.

In order to fully understand the potential impacts of the offshore construction and operations of the proposed Cabrillo Port project, the Coast Guard submitted the DEIS/DEIR to the NMFS Southwest Regional office and NMFS headquarters for comment. Our primary concern was to determine whether the offshore pipelines construction and mooring and operation of the FSRU was likely to adversely affect species listed under the authority of the Endangered Species Act or whether takes of non-listed marine mammals were likely under the Marine Mammal Protection Act. Our conclusions on each relevant species is as follows.

- White Abalone (*Haliotis sorenseni*)-Endangered
  The white abalone usually occurs at depths from 66 to 200 feet (20 to 61m), although
  some have been found in water as shallow as 15 feet (4.6m). The FSRU would be
  anchored in waters approximately 2,900 ft (884m) deep. The offshore pipelines would
  run parallel to the seafloor slope along a relatively broad ridge and two shallow troughs.
  Neither white abalone, nor any other species of abalone have been reported at or near the
  proposed FSRU location or the proposed pipeline routes. Considering the lack of suitable
  hard substrate to which abalone could attach and the algae upon which they feed, the
  possibility of the presence of white abalone is extremely remote. Therefore, the mooring
  and anchoring of the FSRU, the construction of the offshore pipelines, and the operations
  of the FSRU will have no effect on abalone.
- Steelhead (*Oncorhynchus mykiss*)-Endangered
  The Southern California steelhead evolutionarily significant units (ESU) include all
  naturally spawned populations of steelhead and their progeny in streams from the Santa
  Maria River to Malibu Creek. Based on the proposed location of the FSRU and the
  pipelines route, the Cabrillo Port project will not likely to adversely affect this species.
- Boccaccio (Sebastes paucispinnis)-Candidate
   Boccaccio are typically found on rocky bottoms or other structures that provide
   topographical relief. Based on the proposed location of the FSRU and pipelines route,
   the anchoring of the FSRU, the construction of the off-shore pipeline and the operations
   of the FSRU are likely not to adversely affect Boccaccio.
- Pacific rockfish (Sebastes spp.)-Candidate
  Based on the proposed location of the FSRU and pipelines route, the anchoring of the
  FSRU, the construction of the off-shore pipeline and the operations of the FSRU are
  likely to affect, but not adversely affect this species.
- Essential Fish Habitat (EFH) After consultation with experts from California Oceanic Cooperative Fisheries Investigations (CalCOFI), the sampling quadrant, sample locations and data sets were determined. No state or federal listed species were identified in the CalCOFI data; however there are several species located in the proposed project area that are managed by the Pacific Fishery Management Council. Based on a 100% mortality rate, these species make up approximately 0.000013 percent of the larval densities and 0.000010 percent of the egg densities. Therefore, based on the proposed location of the FSRU and pipelines route, the anchoring of the FSRU, the construction of the off-shore pipeline and the operations of the FSRU are likely to affect, but not adversely affect fish identified in essential fish habitat.

- Sei Whale (*Balaenoptera borealis*)-Endangered
  Sei whale observations have been rare in the Southern California Bight for more than 20 years. The possibility of sei whales appearing near the proposed project site is extremely remote. Therefore, based on the proposed location of the FSRU and pipelines route, the anchoring of the FSRU, the construction of the off-shore pipeline and the operations of the FSRU are not likely to adversely affect sei whales.
- Blue Whale (B. musculus)-Endangered
   Very few blue whales have been reported near the mainland coast of the Southern
   California Bight, and their presence is very unlikely near the proposed project.
   Therefore, based on the proposed location of the FSRU and pipelines route, the anchoring
   of the FSRU, the construction of the off-shore pipeline and the operations of the FSRU
   are not likely to adversely affect blue whales.
- Humpback Whale (*Megaptera novaeangliae*)-Endangered
  These whales range closer to the mainland coast and have been reported around many oil
  platforms in the Santa Barbara Channel. However, they have not been reported near the
  mainland coast south of Point Dume, and the possibility of this species appearing at or
  near the proposed project site is very unlikely. Therefore, based on the proposed location
  of the FSRU and pipelines route, the anchoring of the FSRU, the construction of the offshore pipeline and the operations of the FSRU are not likely to adversely affect
  humpback whales.
- Fin Whale (*B. physalus*)-Endangered
  These whales have occasionally been reported around Santa Barbara Island, and one fin
  whale was observed in late winter near the middle of the proposed pipelines route during
  the 1991-1992 NMFS aerial surveys. However, since fin whales are most frequently seen
  during the warmer-water months of summer and fall, this sighting is suspect. Although
  the presence of this species near the proposed project site is possible, it is unlikely. The
  possibility of fin whales appearing near the mainland coast is very remote. Therefore,
  based on the proposed location of the FSRU and pipelines route, the anchoring of the
  FSRU, the construction of the off-shore pipeline and the operations of the FSRU are not
  likely to adversely affect fin whales.
- North Pacific Right Whale (*Eubalaena japonica*)-Endangered Only 23 sightings have been reported from 1855 to 1982. Since that time, two sightings have been reported in the Santa Barbara Channel. The most recent southernmost sighting was made in 1998 off of Cabo San Lucas, Mexico. Considering the exceptional rarity of this species, the likelihood of it appearing at or near the proposed project site is extremely remote. Therefore, based on the proposed location of the FSRU and pipelines route, the anchoring of the FSRU, the construction of the off-shore pipeline and the operations of the FSRU are not likely to adversely affect the North Pacific Right Whale.

- Sperm Whale (*Physeter macrocephalus*)-Endangered Single sperm whales have been reported on three occasions in the Santa Barbara Channel. Considering this species' preference for deep offshore water, the possibility of it appearing at or near the proposed project site is extremely remote. Therefore, based on the proposed location of the FSRU and pipelines route, the anchoring of the FSRU, the construction of the off-shore pipeline and the operations of the FSRU are not likely to adversely affect sperm whales.
- Steller Sea Lion (*Eumetopias jubatus*)-Threatened
  Historically, Steller Sea Lions have been sighted at San Nicolas Island and once inhabited
  San Miguel Island, but disappeared after the 1982-83 El Nino event. Only 2 sightings,
  both of individual animals, have been made in the Southern California Bight since that
  time. The odds of this species appearing at or near the proposed project site are
  extremely remote. Therefore, based on the proposed location of the FSRU and pipelines
  route, the anchoring of the FSRU, the construction of the off-shore pipeline and the
  operations of the FSRU are not likely to adversely affect Steller Sea Lion.
- Guadalupe Fur Seal (Arctocephalus townsendi)
   Guadalupe fur seals were once prolific at the Channel Islands; however, only a few individuals have been reported there in the last century. Strandings are rare, with perhaps a dozen specimens reported in the Southern California Bight over the past three decades. Considering the rarity of this species in U.S. waters, the likelihood of it appearing at nor near the proposed Project site is extremely remote. Therefore, based on the proposed location of the FSRU and pipelines route, the anchoring of the FSRU, the construction of the off-shore pipeline and the operations of the FSRU are not likely to adversely affect Guadalupe fur seals.
- Southern Sea Otter (*Enhydra lutirs nereis*)
  From 1987 to 1990, an attempt to relocate Southern sea otters to San Nicholas Island and establish a new population was unsuccessful. The U.S. Fish and Wildlife Service recently proposed discontinuing this program and the "no-otter zone" established to support the program. Sea otters generally forage in water depths up to 65 ft (20m), and some have been reported in water up to 130 ft (40m) deep. However, kelp beds, a preferred foraging habitat, are not present at or near the proposed project site. Considering the narrow depth range of this species and its scarcity south of Point Conception, the likelihood of any Southern sea otters being seen even in the nearshore waters near the proposed Project site, is remote. Therefore, based on the proposed location of the FSRU and pipelines route, the anchoring of the FSRU, the construction of the off-shore pipeline and the operations of the FSRU are not likely to adversely affect sea otters.

To summarize, the results of the Coast Guard's environmental analysis of the location, construction and operation of the Cabrillo Port Deepwater Port would not have a significant impact on marine mammals, listed species, or essential fish habitat. The relevant criterion that leads to that conclusion are:

- 1. Species protected under the Marine Mammal Protection Act of 1972 and/or the Endangered Species Act or 1973 are extremely unlikely to be in the area of the proposed project.
- 2. The construction of the parallel pipelines and mooring of the FSRU will be limited in geographic scope and of short duration.
- 3. No seawater will be used in the regasification process.

If you have any questions, please contact me or Ms. Joan Lang at (202) 372-1452.

Sincerely,

M. A. PRESCOTT

Chief, Deepwater Ports Standards Division

U. S. Coast Guard By direction

Enclosures:

- 1. Map of FSRU location & offshore pipeline.
- 2. Map of on-shore pipeline crossings

Copy:

- K. Lesnick, MARAD
- A. Zimpfer, EPA 9
- D. Noda, FWS, Ventura Field Office A. Szjii, ACOE, Ventura Field Office



